

REMARKS

Claims 1-22 and 42-45 are in the case.

The present invention relates to a reactor wall coating. Prior to the present invention, reactors had to be shut down, cleaned, then coated with the desired material, and then the reactor could be started up and polymerization of a desired polymerization product commenced. This is a huge waste of time and money. The present inventors have surprisingly discovered that reactor coatings may be applied *in situ* during polymerization. Principal Claim specifically recite this limitation.

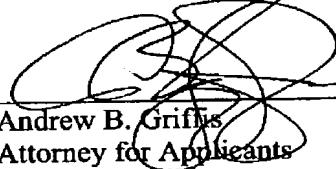
The Idelmann reference (WO 97/49771) is directed to the old-style coatings in the sense of coatings that had to be sprayed onto a reactor wall, necessitating reactor shut down. It is, more specifically, directed to the use of polyethersulfone sulphone (PES) and polyetherimide (PEI) coatings.

It cannot be fairly suggested that these PES or PEI coatings of Idelmann may be coated onto the reactor vessel walls *in situ* during polymerization. The reference is completely silent on the synthesis of PES or PEI. It would be pure speculation, based on the evidence of record, that the coatings described by Idelmann in any way anticipate or fairly suggest the present invention. Any such suggestion would rely on alleged inherent characteristics of the coatings described by Idelmann. Inherency must necessarily flow from the teachings of the applied prior art (see MPEP §2112), and in the present case there is not the slightest evidence that PES or PEI are capable of being formed *in situ* on a reactor wall during polymerization.

Accordingly, it is believed that the present application is in condition for allowance and early notice of the same is earnestly solicited.

Respectfully submitted,

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